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10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 IN RE: SOCIAL MEDIA ADOLESCENT
 13 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

14 This Document Relates to:

15 *A. B., by and through her Guardian Ad*
 16 *Litem, Jeffrey Brown v. Meta Platforms Inc.,*
et al., 4:25-cv-03927;

17 *S.V., filed on behalf of minor S.V. v. Meta*
 18 *Platforms, Inc.; Instagram, LLC; ByteDance*
Inc.; ByteDance Ltd.; TikTok, Ltd.; TikTok,
LLC; TikTok, Inc., 4:25-cv-03982;

20 *A.W. filed on behalf of minor B.W. v. Meta*
 21 *Platforms, Inc.; Instagram, LLC and Snap,*
Inc., 4:25-cv-04208;

22 *T.W. filed on behalf of minor A.W. vs. Meta*
 23 *Platforms, Inc., Instagram, LLC, ByteDance,*
Ltd., ByteDance, Inc., TikTok, Ltd., TikTok,
LLC., TikTok, Inc. and Snap, Inc., 4:25-cv-
04474;

25 *E.A., individually and as next of friend to*
 26 *minor Plaintiff A.A. v. Meta Platforms, Inc.*
et al., 4:25-cv-04965;

27 *N. C., by and through her Guardian Ad*
 28 *Litem, Andrew Cash v. Meta Platforms, Inc.,*
et al., 4:25-cv-06334;

Case No. 4:22-MD-03047-YGR
 MDL No. 3047

**PLAINTIFFS' FIFTEENTH
 CONSOLIDATED EX PARTE
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS AD LITEM**

1 *J.L. filed on behalf of minor E.L. v. Meta
 2 Platforms, Inc.; Instagram, LLC; Bytedance
 3 Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok,
 4 LLC; TikTok, Inc. and Snap, Inc., 4:25-cv-
 06381;*

5 *A.W., by and through her Guardian Ad
 6 Litem, Crystal Welch v. Meta Platforms, Inc.,
 7 et al., 4:25-cv-06619;*

8 *J.W. filed on behalf of minor A.W. v. Meta
 9 Platforms, Inc.; Instagram, LLC; Bytedance
 10 Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,
 11 LLC; TikTok, Inc. and Snap, Inc., 4:25-cv-
 07186;*

12 *N.E. filed on behalf of minor T.E. v. Meta
 13 Platforms, Inc.; Instagram, LLC; Bytedance
 14 Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,
 15 LLC and TikTok, Inc., No. 4:25-cv-7205;*

16 *A.S. filed on behalf of minor A.S. v. Meta
 17 Platforms, Inc.; Instagram, LLC; Bytedance
 18 Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,
 19 LLC and TikTok, Inc., No. 4:25-cv-7218.*

APPLICATION

20 Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians
 21 *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby
 22 submits Plaintiffs’ Fifteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad
 23 Litem* (“*Ex Parte* Application”) for this Court’s consideration.

24 “Fit parents are presumed to act in the best interests of their children.” *J.B. by &
 25 Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021
 26 WL 3115195, at *2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000);
 27 *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-
 28 RS, 2015 WL 7350183, at *1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party
 to the lawsuit is presumed to be a suitable guardian *ad litem*, and so the court often appoints the
 parent as guardian *ad litem* upon receipt of an *ex parte* application without exercising much
 discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed
 guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL

1 2002370, at *3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-
 2 01165-AWI NEW (TAG), 2007 WL 1390672, at *3 (E.D. Cal. May 9, 2007)); *accord J.M. v.*
 3 *Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at *2 (N.D. Cal. Sept.
 4 16, 2016). However, “[w]hen there is a potential conflict between a perceived parental
 5 responsibility and an obligation to assist the court in achieving a just and speedy determination of
 6 the action, a court has the right to select guardian ad litem who is not a parent if that guardian
 7 would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at *1 (citations omitted)
 8 (internal quotation marks omitted).

9 Attached as Exhibits 1-11 to the Declaration of Jennie Lee Anderson in Support of
 10 Plaintiffs’ Fifteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 11 (“Anderson Decl.” or “Anderson Declaration”) are the *Ex Parte* Applications for Appointment of
 12 Guardians *Ad Litem* (“Applications”) submitted by the parents and/or legal guardians of individual
 13 minor Plaintiffs in the following cases.

- 14 • *A. B., by and through her Guardian Ad Litem, Jeffrey Brown v. Meta Platforms Inc., et*
 15 *al.*, 4:25-cv-03927 (Exhibit 1);
- 16 • *S.V., filed on behalf of minor S.V. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*
 17 *Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok, LLC; TikTok, Inc.*, 4:25-cv-03982 (Exhibit 2);
- 18 • *A.W. filed on behalf of minor B.W. v. Meta Platforms, Inc.; Instagram, LLC and Snap,*
 19 *Inc.*, 4:25-cv-04208 (Exhibit 3);
- 20 • *T.W. filed on behalf of minor A.W. vs. Meta Platforms, Inc., Instagram, LLC, ByteDance,*
 21 *Ltd., ByteDance, Inc., TikTok, Ltd., TikTok, LLC., TikTok, Inc. and Snap, Inc.*, 4:25-cv-
 22 04474 (Exhibit 4);
- 23 • *E.A., individually and as next of friend to minor Plaintiff A.A. v. Meta Platforms, Inc. et*
 24 *al.*, 4:25-cv-04965 (Exhibit 5);
- 25 • *N. C., by and through her Guardian Ad Litem, Andrew Cash v. Meta Platforms, Inc., et*
 26 *al.*, 4:25-cv-06334 (Exhibit 6);

- *J.L. filed on behalf of minor E.L. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok, LLC; TikTok, Inc. and Snap, Inc.*, 4:25-cv-06381 (Exhibit 7);
- *A.W., by and through her Guardian Ad Litem, Crystal Welch v. Meta Platforms, Inc., et al.*, 4:25-cv-06619 (Exhibit 8);
- *J.W. filed on behalf of minor A.W. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC; TikTok, Inc. and Snap, Inc.*, 4:25-cv-07186 (Exhibit 9);
- *N.E. filed on behalf of minor T.E. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC and TikTok, Inc.*, No. 4:25-cv-7205 (Exhibit 10);
- *A.S. filed on behalf of minor A.S. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC and TikTok, Inc.*, No. 4:25-cv-7218 (Exhibit 11).

Exhibits 1-11 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the Anderson Declaration as Exhibits 1-11 are consistent with Attachment A to this Court's Guardian *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information (including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Anderson Decl. ¶ 14.

Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or legal guardians in the cases listed above are deemed presumptively approved upon filing, as there

1 is no apparent conflict between the applicants' parental responsibility and their obligation to assist
 2 the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing
 3 *J.M.*, 2016 WL 494299, at *1). This Court also ordered that, absent the filing of an objection, the
 4 presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is
 5 filed. ECF No. 122 ¶ 5. The objection period will close on October 20, 2025.

6 Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte*
 7 Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian
 8 named in the Applications submitted in the case listed above.

9
 10 Dated: October 3, 2025

Respectfully submitted,

11 **ANDRUS ANDERSON LLP**

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Plaintiffs' Steering Committee Membership

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